

Exhibit A

Proposed Order

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

RIPPLE LABS INC., BRADLEY GARLINGHOUSE, and
CHRISTIAN A. LARSEN,

Defendants.

Case No.:
20-cv-10832 (AT)(SN)

**[PROPOSED] ORDER FOR ALL NON-PARTY RESPONSES TO PENDING MOTIONS
TO SEAL PARTIES' MOTIONS TO EXCLUDE EXPERT TESTIMONY**

Plaintiff Securities and Exchange Commission ("SEC") and Defendants Ripple Labs Inc., Bradley Garlinghouse, and Christian A. Larsen (collectively, the "Parties") jointly request that the Court establish a deadline of July 28, 2022, by which all non-parties that have been given notification under the Protective Order must submit any letters to seal or redact information in the Parties' *Daubert* Motions (ECF Nos. 532-549).

IT IS HEREBY ORDERED THAT: any non-parties that (i) have not already given consent to one of the Parties for their proposed redactions of the non-parties' confidential information appearing in the *Daubert* Motions; and (ii) seek additional or different redactions, must file, by **July 28, 2022**, a letter explaining the need for such redactions. If no such letter is received by July 28, 2022, the non-party will have waived their right to object to the Court's ultimate ruling on the Parties' motions to seal or redact the *Daubert* Motions.

Dated: _____, 2022

By: _____
Honorable Analisa Torres
United States District Judge